

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Rodney, IA Post Office  
Rodney, Iowa

Docket No. A2011-27

Comments of the Public Representative

(October 25, 2011)

I. Summary of Proceedings

The Commission received an appeal for review of the closing of the Rodney, Iowa Post Office. The petition, which was filed by Zella Thomas, Mayor of the City of Rodney, Iowa, (Petitioner) is postmarked July 13, 2011, and was posted on the Commission's website on July 21, 2011.<sup>1</sup> In Order No. 769 the Commission instituted a proceeding under 39 U.S.C. 404(d)(5), designated the case as Docket No. A2011-27 to consider the Petitioner's appeal and designated the undersigned as Public Representative.<sup>2</sup>

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<sup>1</sup> Petition for Review Received from Mayor Zella Thomas, Regarding the Closure of the Rodney, Iowa Post Office 51051, July 21, 2011 (Petition). See *also* Attachment Letter from Congressman Steve King, 5<sup>th</sup> Congressional District, IA, July 12, 2011. Congressman King requests that the Commission respond to Mayor Thomas' appeal and inform him of the decision.

<sup>2</sup> Notice and Order Accepting Appeal and Establishing Procedural Schedule, July 22, 2011 (Order No. 769).

The Postal Service decision that is the subject of this proceeding was made on June 15, 2011. The customers of the post office were notified of the final decision on June 20, 2011. The Petitioner raises the issue of whether the Postal Service failed to follow its statutory requirements for post office closures (see 39 U.S.C. 404 (d)(2)(A)).

The Commission's Notice designated August 5, 2011, as the date for the Postal Service to file the administrative record. On August 5, 2011, the Postal Service filed a electronic copy of the administrative record in response to Order No. 769.<sup>3</sup>

The Commission's Notice also set forth the date for the Petitioner's filing of a brief or supplemental response. The Petitioner's response was due on August 25, 2011. To date there has been no initial brief or PRC Form 61, filed by the Petitioner.<sup>4</sup> The Postal Service filed comments in lieu of a reply brief on September 14, 2011.<sup>5</sup> The Postal Service contends in its comments that the appeal presents three specific issues pursuant to 39 U.S.C. 404 (d)(1)(2) related to the closing of the Rodney, Iowa Post Office: (1) the effect on postal services, (2) impact of the closing on the Rodney Community, and (3) effect on postal employees. Postal Service Comments at 1.

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<sup>3</sup> United States Postal Service Notice of Filing, August 5, 2011.

<sup>4</sup> The Public Representative contacted the Petitioner by letter on August 11, 2011, regarding the appeal but has not received a response.

<sup>5</sup> United States Postal Service Comments regarding Appeal, September 14, 2011 (Postal Service Comments).

The Postal Service's administrative record in this proceeding is not disputed by the Petitioner since she has submitted no further information to refute the record or further explain the reasons for this appeal. The Petitioner asserts that the Postal Service had not filled the postmaster position since 1993 and an officer in charge was appointed rather than a postmaster. Petition at 1. Additionally, the Petitioner states that the citizens of Rodney did not want the post office to close. *Id.* The administrative record includes a letter from Kent Gochenour, Manager for Post Office Operations, which initiated the investigation for discontinuance of the Rodney, Iowa Post Office on January 7, 2011. AR at 1. The administrative record provides that the postmaster position has been vacant since a retirement on April 28, 1993. *Id.* The reasons given by the Postal Service for the discontinuance study include the minimum workload, revenue, need for more operational efficiency and the ability of the Postal Service to provide effective and regular service by an alternate means. *Id.* The District Manager, Gail Dubua approved the study for discontinuance. *Id.*

On February 1, 2011, Manager Gochenour distributed a letter to Rodney Post Office customers that advised them of the administrative investigation, reasons for the proposal to close the location, and options for alternative service, which consisted of a combination of rural carrier service and use of the Smithland Post Office, two miles away. AR at 21a. The letter also stated that a meeting with postal representatives and the community would be held on February 15, 2011. The letter was accompanied by questionnaires to be returned by February 18, 2011, regarding mail service and community concerns. *Id.* The letter included a summary of post office regulations related to the proposal and rural carrier delivery service information. *Id.* Of the 50 questionnaires that were distributed, the Postal Service states that 18 questionnaires were returned, with 2 favorable responses, 6 unfavorable, and 10 with no opinion. AR, Item 47, Page 2.

On February 15, 2011, Postal Service representatives met with 16 persons interested in the closing of the Rodney Post Office. AR at 25.<sup>6</sup> The administrative record includes a copy of a letter dated March 7, 2011, from Karen Lenane, Post Office Review Coordinator, to the officer in charge of the Rodney Post Office to post the proposal to close the Rodney, Post Office. The Proposal was posted from March 9, 2011 to May 18, 2011, at the Rodney Post Office and March 17, 2011 to May 18, 2011 at the Smithland Post Office. AR Item 36, pgs. 1-2. The proposal provided information to patrons regarding the amount of retail transactions at the Rodney Post Office, revenue, and alternative postal service options. Additionally, it reported customer concerns raised at the meeting held with citizens and results from the questionnaires sent to customers. AR, Item No. 33. The administrative record contains copies of the questionnaires and the Postal Service responses to issues raised by patrons. AR Pages 21c- 22bb.

After review of the issues raised by patrons resulting from the posting of the proposal and the public meeting the Postal Service determined that its resources could be used more effectively through the alternative postal service options for the Rodney community. The Postal Service determined that it could provide regular and effective postal services to the Rodney, Iowa community with the alternative services proposed. The notice of the final determination was posted at the Smithland Post Office and the Rodney Post Office from June 20, 2011 to July 22, 2011.

The administrative record supports the Postal Service's claim that it has considered the issues raised from the general public and postal service customers. AR 23a-25. The Postal Service has complied with 39 U.S.C. 404 (d)(1) by providing notice of its intention to close the Rodney, Iowa Post Office, allowing an opportunity for the

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<sup>6</sup> The Postal Service includes a meeting analysis of community concerns raised in the meeting including safety issues associated with street mail box installation, disabled citizens' access to postal services, and the negative impact of the closing on local business. The Public Representative notes however, that in part of this analysis the Postal Service refers to the loss of the Kelley Post Office rather than the Rodney Post Office. This may be an error in the record so there is uncertainty if the entire meeting analysis applies to the Rodney, Iowa Post Office closing.

general public and customers to comment on the possible closing and responding to customer concerns.

## II. Discussion

*Effect on postal services and postal employees.* The administrative record Final Determination (FD) indicates that the Rodney Post Office was designated an EAS -53 level post office, provided window service from 8:30 a.m. to 1:00 p.m. Monday through Friday, 10:00 a.m. to 11:30a.m. on Saturday and lobby hours of 8:30 to 1:00 Monday through Friday and 10:00 a.m.to 11:30 a.m. on Saturday. AR at 8; FD at 2. The Rodney Post Office provided service to 20 Post Office Box customers, no general delivery customers and some retail customers. FD at 2, Item 18. The retail window averaged 4.1 daily transactions and accounted for only four minutes of retail workload daily. The daily retail transactions were very low. Office receipts for the last three fiscal years were as follows: FY2008 -\$3,976, FY2009- \$7, 741 and FY2010- \$3,579. The Postal Service states that the alternative post office facility for the Rodney community is the Smithland Post Office that is approximately 2.2 miles away. The Smithland Post Office provides hours of service from 7:00 a.m. to 4:30 p.m. Monday through Friday, and 7:00 a.m. to 9:00 a.m. Saturday. *Id.* The change to the Smithland Post Office provides customers more hours of service than the Rodney Post Office.

The Petitioner also asserts that the Postal Service has not appointed a postmaster to the Post Office in Rodney, Iowa. In its comments the Postal Service states that after the Postmaster's retirement on April 28, 1993, a "temporary officer-in-charge" was appointed. The Postal Service also mentions that the officer in charge will return to the Smithland Post Office or may be reassigned. Postal Service Comments at 2. Additionally, the Postal Service states no other employees are affected by this change. *Id.* This response addresses the Petitioner's concerns regarding effects on postal employees. It appears that the impact of closing on employees is minimal. The Postal Service has complied with 39 U.S.C. 404 (d)(2)(A)(ii).

The Postal Service also includes a review of the economic savings that will result from the closing of the Rodney Post Office. FD at 6. The Postal Service finds that it can support carrier service and retail service changes to the Smithland Post Office and have annual savings in the amount of \$19,370. This includes the Postmaster salary and benefits of \$20,492 plus rental costs of \$1500. The cost of the replacement service is estimated at \$2622. *Id.* It is the Public Representative's view that if the officer in charge is reassigned the cost of the salary and benefits does not result in actual savings to the Postal Service.

*Effect on the Rodney Community.* The administrative record provides that customers generally communicated to the Postal Service concerns about mail security, accessibility issues for disabled and senior citizens, limited savings and benefits from closing, and a need for additional mailboxes. The Postal Service's responses adequately addressed each of the issues presented. It explained that security of mailboxes may be addressed with customers' use of locks for mailboxes and indicated it would review the installation of cluster box units, which provide the security of individually locked mail compartments. Further, it stated that seniors and disabled customers had the option to receive postal services by rural route carrier and stamps by mail. It also noted that persons with disabilities could also request an exception for hardship delivery. The Postal Service reviewed the use of cluster boxes and safety issues inherent in the street installation of mailboxes. Additionally, patrons raised concerns about the need to travel to a new location in order to use postal services. The Postal Service acknowledged these concerns and offered the available options of retail transactions done by rural route carrier and certain Internet transactions that do not require a trip to the post office. AR, Item 33.

Rodney Post Office customers' responses in meetings and the questionnaires also indicated that the closing resulted in a loss of a meeting place, local information center and social outlet. Customers stated that the closing would also negatively impact local businesses and deter new business. The Postal Service responded that there are

other places in the community that can be used as meeting places. It also stated that the alternative postal services available from the rural route carrier and the Smithland Post Office should meet business requirements and provide regular and effective postal services to handle any growth in the vicinity. AR at 23a. The Postal Service has complied with consideration of the effect on the community. 39 U.S.C. 404(d)(2)(i).

The Postal Service has determined that the cumulative result of all factors to be considered in the instant case make closure the best option for the community to receive regular and effective postal services. The Public Representative agrees that the citizens will receive regular and effective postal services with the alternative services provided through rural route carrier services and the retail services provided by the Smithland Post Office approximately two miles away.

*Conclusion.* The Postal Service has demonstrated that it can continue to provide regular and effective postal services to the Rodney, Iowa community. The decision to close the Rodney Post Office should be affirmed by the Commission.

Respectfully Submitted,  
/s/ Cassandra L. Hicks  
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